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ATTACHMENT 1

2017 APR -13 AM 10:20

COMPLAINT FORM

PETER OPPENEER
CLERK US DIST COURT
WD OF WI

(for non-prisoner filers without lawyers)

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF iv

(Full name of plaintiff(s))

Patricia Williams

vs

(Full name of defendant(s))

Dept of Workforce

Development & Dept of

Administration

Case Number:

17 C 253

(to be supplied by clerk of court)

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at
(State)

201 East Washington Av. Madison, WI 53707

(Address)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant DWD Dept of Workforce Development
(Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)
and (if a person) resides at 201 East Washington Avenue - Madison
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for DWD & DOA
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

1. Oscar Aviles, Michael Schnapp, Diane Schultz, Sandy Ellsworth, Karin Betz,
Amy Grotkze, Tom Draghi, Aaron Shovich, Coreen Knop, Kenneth Kleuver, and
Enid Glenn. (Aaron Shovich is a State Controller at the Department of Administration).

2. They all were involved in printing, forging, and cashing DVR Training Grant Checks
by using the Plaintiff Identity. No one reported that a crime had taken place within the
DVR Consumer, Patricia Williams DVR Case File where it is documented. The
Defendants violated the Reco Laws by organizing 2 or more state agencies to carry
out this crime. State Agencies involved are (DWD, DOA State Controller Office and the
DOA Print Shop). This happened while the Plaintiff is a DVR Participate.

3. This crime started happening in 2006 until this present time.

This happened at the DWD Central office, DWD/DVR office, DOA State

Controller office, DVR Elkhorn office, and the DOA Print Shop in Madison, Wisconsin.

4. This crime were committed because of GREED and because there are 26,000

vulnerable DVR Job Training Participates in the DWD/DVR program, and lot of them

can not fight back against embezzlement and identity theft of Federal Funds.

DWD/DVR staff personnel discriminated against the Plaintiff

and retaliated against based on her disability and for exercising her First Amendment

right under the Rehab Act of 1973 as Amended of Section 504 and title I of the ADA.

Thereafter, Plaintiff suffered humiliation, emotional distress, embarrassment, loss of

liberty, life enjoyment, harassment, denied permanent employment and retaliation.

The Plaintiff is a DVR Consumer and Applicant trying to get back into Wisconsin

Workforce. She has been working with a DVR Counselor who assist disable people

to get back into the Workforce. The Plaintiff has the records that came to her by an

open records request. And the Plaintiff is suffering right now from disparate treatment

and an adverse action in employment caused by DWD/DVR staff personnel.

Other (DWD Employees) involved are Raymond Allen, Sheri Pollock, Delori Newton,

and Karl Dahlen whom is employed by DWD which is the DWD Central Office

Administrative Staff. The ARRA Funds stolen are Federal Funds

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

Relief in Damages:

Count 1. Violation of the Rehab Act of 1973 as amended of Section 504

Plaintiff is seeking \$5 Million in Compensatory & Punitive Damages in order to be

made whole again because of her Civil & Constitution rights are being violated by

being discrimination against based on her disability which caused an adverse action.

Secondly, Plaintiff is requesting Attorney fees and cost.

Count 2: Violation of the Civil Rights Act of 1964 of VII and Title I of the ADA

American with Disabilities Act of 1990 as Amended. And the violation of the Rico Act.

And Plaintiff request that the Court provide whatever else financial assistance that this

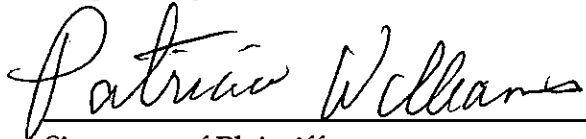
court deems proper. Count 3: Racketeer Influenced and Corrupt Organizations Act (Rico)

E. JURY DEMAND

- ☒ Jury Demand - I want a jury to hear my case
OR
☐ Court Trial - I want a judge to hear my case

Dated this 31 day of March, 2017.

Respectfully Submitted,



Signature of Plaintiff

Plaintiff's Telephone Number

608-841-1369

Plaintiff's Email Address

Princess.192318@yahoo.com

P.O.Box 259583 - Madison, WI 53725

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

- ☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.
- ☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.